

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA**

Allison Haley Manley, )  
)  
Plaintiff, )  
)  
vs. )  
)  
**Ricky W. Chastain**, individually, )  
and as Sheriff of Laurens County, SC; )  
**Michael Thomason**, individually, )  
and as an employee of the Laurens )  
County Sheriff's Department, SC; )  
**Luther "Ted" Richardson**, )  
individually, and as an employee )  
of Laurens County Sheriff's )  
Department, SC; **Duane Howard**, )  
individually, and as an employee of )  
Laurens County Sheriff's Department, )  
SC; **Denna Griffin**, individually, and )  
as an employee of Laurens County )  
Sheriff's Department, SC; )  
**Laurens County, SC; Laurens )  
County Sheriff's Department, SC,** )  
)  
Defendants. )

**MEMORANDUM IN SUPPORT OF  
DEFENDANTS RICKY W.  
CHASTAIN, INDIVIDUALLY AND  
AS SHERIFF OF LAURENS  
COUNTY, SC AND LAURENS  
COUNTY SHERIFF'S  
DEPARTMENT, SC'S MOTION TO  
AMEND ANSWER  
TO PLAINTIFF'S COMPLAINT**

*Civil Action Number:*  
6:11-cv-01607-JMC-KFM

Defendants Ricky W. Chastain, Individually, and as Sheriff of Laurens County, South Carolina and Laurens County Sheriff's Department, SC, respectfully request that they be granted leave of court to file an Amended Answer to the plaintiff's Complaint, and to assert an additional defense, identified as their Third Defense in the proposed Amended Answer served herewith.

**ARGUMENT:**

Defendants Ricky W. Chastain, Individually, and as Sheriff of Laurens County, South Carolina and Laurens County Sheriff's Department, SC seek leave of court to assert an additional legal defense, which is set forth as the third defense in the proposed Amended Complaint. This motion is being made timely and within the time constraints provided for in this court's Scheduling Order. Further, pursuant to Rule 15 FRCP, leave to amend should be freely given to meet and/or satisfy the ends of justice. In this matter, there is no prejudice to any party, nor does this amendment delay or affect any pending discovery.

**CONCLUSION:**

Defendants Ricky W. Chastain, Individually, and as Sheriff of Laurens County, South Carolina and Laurens County Sheriff's Department, SC respectfully submit and request that their Motion to Amend be granted.

Respectfully submitted,

s/ Russell W. Harter, Jr.

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**ATTORNEY FOR DEFENDANTS**

**Ricky W. Chastain, individually, and as Sheriff  
of Laurens County, SC and Laurens County  
Sheriff's Department, SC**

August 12, 2011  
Greenville, South Carolina